

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA      )  
  ) No. 14 CR 287  
v.                                     )  
  ) Judge Charles R. Norgle  
LEONARDO SANDERS                 )  
  )

DEFENDANT SANDERS' SECOND MOTION  
TO EXTEND TIME FOR VOLUNTARY SURRENDER

Defendant LEONARDO SANDERS, by the Federal Defender Program and its attorney, DANIEL HESLER, moves this court extend the date on which Mr. Sanders will be required to surrender himself to the custody of the Bureau of Prisons. Mr. Sanders would like to get in and get his time done, but his fiancé is going through a high risk pregnancy and requires what is nearly full time care. For this reason, Mr. Sanders would like to extend his report date until September 20, 2018. In further support of this motion, defendant states as follows:

1.     On November 30, 2017, this Court sentenced Mr. Sanders to serve 28 months in the custody of the Bureau of Prisons. Mr. Sanders was ordered to surrender himself into custody at the designated institution by 2:00 p.m. on February 20, 2018. That date has been extended to April 20, 2018.
2.     Mr. Sanders received notice that he had been designated to an institution at Terre Haute, Indiana. Most likely, he will serve his time at the

minimum security camp there.

3. Mr. Sanders' fiancé is pregnant, in a very high risk pregnancy. She is presently on bedrest. In order to assist her, Mr. Sanders helps her with cooking, cleaning, personal care, administering medication, and transportation to medical appointments. It is very nearly a full time task.

4. It turns out that the pregnancy is not getting any easier. Mr. Sanders' fiance's bed rest conditions have now been ordered to continue until her due date. The due date for their child is September 8, 2012.

5. For these reasons, Mr. Sanders would like a five month extension in his surrender date, to September 20, 2018.

6. Of the six defendants in his case, Mr. Sanders is the only one who has proceeded with sentencing. In the context of this case, the delay that is being requested will still probably put his report date ahead of those of his co-defendants.

Therefore, it is respectfully requested that this court extend the time by which Mr. Sanders will be required to surrender himself into custody to September 20, 2018, by 2:00 p.m.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM  
Carol A. Brook  
Executive Director

By: *s/ Daniel J. Hesler*  
Daniel J. Hesler

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DANIEL J. HESLER  
FEDERAL DEFENDER PROGRAM  
55 E. Monroe Suite 2800  
Chicago, IL 60603  
(312) 621-8347

**CERTIFICATE OF SERVICE**

The undersigned, Daniel J. Hesler, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CIV.P5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

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was served pursuant to the district court's ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on April 3, 2018, to counsel/parties that are non-ECF filers.

By: /s/ Daniel J. Hesler  
DANIEL J. HESLER  
FEDERAL DEFENDER PROGRAM  
55 E. Monroe St., Suite 2800  
Chicago, Illinois 60603  
(312) 621-8347